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18 FORT JAMES CORPORATION  
19 AND RELATED ENTITIES

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18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

20 JEFFREY H. BECK, Liquidating  
21 Trustee of the Crown Paper Liquidating  
22 Trust,

Case No. C 05-0798 MMC

23 Plaintiff,

24 **STIPULATION AND [PROPOSED]**  
25 **ORDER DEFERRING BRIEFING**  
26 **AND HEARING DATES FOR**  
27 **DEFENDANTS' MOTIONS FOR**  
28 **ATTORNEYS' FEES**

20 FORT JAMES CORPORATION;  
21 FORT JAMES OPERATING  
22 COMPANY; FORT JAMES FIBER  
23 COMPANY; FORT JAMES  
24 INTERNATIONAL HOLDINGS LTD;  
25 AND MCGUIREWOODS, LLP,

26 Courtroom: 7 (19<sup>th</sup> Floor)  
27 Judge: Hon. Maxine M. Chesney

28 Defendants.

1 Pursuant to Rule 6-2 of the Local Rules of the Northern District of  
2 California and FRCP 54(d)(2), plaintiff Jeffrey H. Beck, Liquidating Trustee  
3 ("Plaintiff"), and defendants Fort James Operating Company, Fort James Fiber  
4 Company, and Fort James International Holdings, Ltd., (collectively, "Fort James  
5 Defendants") and McGuireWoods LLP ("MW," and collectively with the Fort James  
6 Defendants, "Defendants", and collectively with the Fort James Defendants and  
7 Plaintiff, the "Parties") stipulate as follows and respectfully request that the Court  
8 enter the Parties' proposed order appended hereto.

10 WHEREAS, on December 14, 2006, the Court entered judgment in this  
11 Action in favor of Defendants:

13                   WHEREAS, pursuant to FRCP 54(d)(2) and Local Rule 54-6, motions  
14 for attorneys' fees must be filed no later than 14 days after entry of judgment, but the  
15 time can be extended by stipulation and order;

17                   WHEREAS, without a stipulation and order extending the time,  
18 Defendants would have to file attorneys' fees motions no later than December 28,  
19 2006;

21                   WHEREAS, on December 15, 2006, the Court heard and took under  
22 submission, among other things, the Fort James Defendants' Motion for Summary  
23 Judgment on Count II of Plaintiffs' Second Amended Complaint (Fraudulent  
24 Transfer Claim Relating to 1998 Option and Settlement Agreement ("OSA")) in the  
25 related action, *Crown Paper Company v. Fort James Corporation*, Case No. C 02-  
26 3838 MMC ("Count II Summary Judgment Motion");

1                   WHEREAS, Defendants' right to recover attorneys' fees incurred in this  
2 Action potentially depends upon the enforceability and validity of the OSA, which  
3 will not be determined (i) unless and until the Court grants the Court II Summary  
4 Judgment Motion, or (ii) until a resolution through trial (which is scheduled to  
5 commence on February 5, 2007) if the Court denies the Count II Summary  
6 Judgment Motion;

8                   WHEREAS, the Parties agree that the Parties and the Court should not  
9 go through the time and expense of briefing, arguing, and hearing attorneys' fees  
10 motions in this Action before the Court has ruled on Plaintiff's claim that the OSA is  
11 avoidable as a fraudulent transfer;

13 IT IS HEREBY STIPULATED AND AGREED that Defendants' time to file  
14 attorneys' fees motions in this Action shall be extended, so that Defendants shall file  
15 attorneys' fees motions no later than 14 days after (i) the Court grants the Count II  
16 Summary Judgment Motion if the Court grants the Count II Summary Judgment  
17 Motion, or (ii) the Court enters judgment on Count II of the Second Amended  
18 Complaint if the Court denies the Count II Summary Judgment Motion.

20 | DATED: December 20, 2006

BEUS GILBERT PLLC

By */s/ Albert J. Morrison*

Albert J. Morrison  
Attorneys for Plaintiff

1 DATED: December 20, 2006

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3

4 By

*/s/ Theodore A. Cohen*

5 Theodore A. Cohen

6 Attorneys for Fort James Defendants

7 DATED: December 20, 2006

8 KRIEG, KELLER, SLOAN, REILLEY & ROMAN  
9 LLP

10 By

*/s/ James C. Krieg*

11 James C. Krieg

12 Attorneys for Def. MCGUIRE WOODS LLP

13 Good cause appearing,

14

15 IT IS HEREBY ORDERED that Defendants' time to file attorneys' fees  
16 motions in this Action shall be extended, so that Defendants shall file attorneys' fees  
17 motions no later than 14 days after (i) the Court grants the Count II Summary  
18 Judgment Motion if the Court grants the Count II Summary Judgment Motion, or  
19 (ii) the Court enters judgment on Count II of the Second Amended Complaint if the  
20 Court denies the Count II Summary Judgment Motion.

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22 DATED: December 22, 2006

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Hon. Maxine M. Chesney  
United States District Judge